



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Applications of)	WT DOCKET NO. 02-179
)	
RESORT AVIATION SERVICES,)	
INC.)	INTERROGATORIES TO RESORT
)	AVIATION SERVICES, INC. AND
)	ANSWERS THERETO
)	
For Renewal of Aeronautical Advisory)	
Station WYT9, Coeur d'Alene Airport,)	
Hayden, Idaho)	
)	
and)	
)	
KOOTENAI COUNTY)	
COEUR D'ALENE AIRPORT,)	
)	
)	
For a New Aeronautical Advisory)	
Station at Coeur d'Alene Airport,)	
Hayden, Idaho)	

Resort Aviation Services, Inc. answers the interrogatories of Kootenai County
Coeur d'Alene Airport as follows:

INTERROGATORY NO. 1: Please provide the following information concerning

Resort Aviation Inc:

- (a) The date of incorporation.
- (b) All officers, directors, and members of the corporation with complete names,
addresses and telephone numbers.

ANSWER TO INTERROGATORY NO. 1.

a. March 28, 1988

No. 02-179-046
JAN 10 2003

b. Fred M. Miller
3915 W. commonwealth
Fullerton, **CA** 92833

J.B. DeNault III
3915 W. Commonwealth
Fullerton, CA 92833

INTERROGATORY NO. 2: Please state the type of business Resort Aviation Inc.

engages in, the purpose of said business, and how these objectives are met.

ANSWER TO INTERROGATORY NO. 2.

Resort Aviation is an FBO, providing professional products and services to all classes of aircraft pilots as defined below:

Fuel: We are a Chevron authorized dealer for 100LL and JetA
Crew and passenger accommodations
Baggage handling
Full service lobby for passengers convenience
Pilot lounge
Meeting conference room, available
Full kitchen, including ice for aircraft user
Computer service for pilots with free link to Flight Service and National Weather Service.
Lavatory service and de-icing service
Pilot training
Aircraft rental
Car rental for pilots and passengers: We are an authorized Thrifty Agent.
Aircraft tie down and hanger accommodations. (single-engine to Corporate turbine aircraft)
Pilot supplies – from charts to radios.

The purpose of these services is to offer a broad range of products and service to the aircraft user, which provide an annual sales growth.

These objectives are met by having excellent, well-trained Department Managers, who have employees, under them, equally well-trained to give Professional service.

The results are that we have a sales growth and repeat customers.

INTERROGATORY NO. 3: Please state how Resort Aviation Services, Inc. came to be the holder of the present Unicorn license at the Coeur d'Alene Airport. By this interrogatory we seek:

- (a) The date of application, if any.
- (b) The party through whom Resort Aviation Services, Inc. obtained the Unicorn license
- (c) The date the Unicom license was granted to Resort Aviation Services, Inc., and
- (d) The method by which the Unicorn license was granted to Resort Aviation Services, Inc.
- (e) Who did Resort Aviation Services, Inc. notify prior to its receiving the transfer of the Unicom license?

ANSWER TO INTERROGATORY NO. 3.

Resort purchased Empire Airlines, 1996.

- a. Date of application: 10/15/96
- b. FCC
- c. 12/19/96
- d. Transfer
- e. Heliprop
River City Helicopter
Aviation Services Inc.
Airport Office

INTERROGATORY NO. 4: Please list all persons who Resort Aviation Services, Inc. has authorized to operate its Unicorn frequency at the Coeur d'Alene Airport. By this interrogatory, we seek:

- (a) The names of all individuals who operate the Unicorn frequency;
 - (b) The date and times the individuals operate the Unicorn frequency;
 - (c) The length of time the individual has been operating the Unicorn frequency for Resort Aviation Services, Inc.;
 - (d) Any prior Unicorn experience of the individual;
 - (e) **Any** and all education, training and experience of which the individual has. relevant to operating the Unicorn frequency. (? —John. did I correct this as you wished?)
 - (f) All accredited Federal Communications Training the individual has received;
- and
- (g) Any and all Federal Aviation Administration training obtained before and during the individual's employment and operation of the Unicorn license for Resort Aviation Services, Inc.

ANSWER TO INTERROGATORY NO. 4.

Names of employees authorized to operate Unicorn frequency:

- a. Kathy Garren, Operations Manager
Denise Johnson
Dawn Hull
Mike Graziani, Line Manager
Roy DeFranco, Senior Instructor
Shane Dickess
- b. The date and times the above operate the Unicorn frequency would be dependent upon the days and shifts worked by the employee. The Company is open for business and operates the Unicorn during the hours listed below:

Weekdays

Weekends

Summer	7 AM – 7 PM	8 AM – 6 PM
Winter	7 AM – 6 PM	8 AM – 5 PM

There *is* an authorized Unicom operator present for the above hours.

- c. Kathy Garren – 6 years
- Denise Johnson - 2 months
- Dawn Hull - 2 years
- Mike Graziani - 5 years
- Roy DeFranco - 3 years
- Shane Dickess - 1 year

- d. The question is ambiguous: Do you mean prior to employment at Resort Aviation. If that is the case see below:

Mike Graziani, Line Manager	= 9 yrs
Denise Johnson	= 19 yrs.
Roy DeFranco, Senior Instructor	= 11 yrs.

- 1. Seminar with an FAA Certified Flight Instructor.
- 2. Two weeks of on the job training under the direct supervision of Ms. Garren.

- f. Ms. Garren called the FCC, Consumer Department, Donna Creager, she stated that there are no training courses for Unicom. She confirmed that the best way to train is by a Certified Flight Instructor/Pilot and go through the Unicorn Regulations.

Note: This is the procedure we have and continue to use for our employee training.

- g. Contacted 11/13/02, Don Bird at FAA Flight Service Station, Spokane Washington, he referred me to John Black. I asked if there was a training course available through the FAA, for operating a Unicom. Mr. Black's research found nothing for training personal on Unicom with the **FAA**. He suggested contacting FCC.

INTERROGATORY NO. 5: What other facilities does Resort Aviation Services, Inc.

operate beyond its facilities at the Coeur d'Alene Airport in Kootenai County, Idaho? In

answering this interrogatory please list the city, county, and state, as well as the address

and telephone number of any and all other facilities operated by Resort Aviation Services, Inc.

ANSWER TO INTERROGATORY NO. 5. None.

INTERROGATORY NO. 6: Please list all other states within which Resort Aviation Services, Inc. operates. By this written interrogatory request, we seek the names of all states within which Resort Aviation Services, Inc. operates, not merely those within which the corporation is licensed or authorized.

ANSWER TO INTERROGATORY NO. 6. None.

INTERROGATORY NO. 7: For all of the officers, directors and members listed in Interrogatory No. 1, please state whether said individual is an officer, director or shareholder in any other entity engaged in the business of aviation directly or peripherally.

ANSWER TO INTERROGATORY NO. 7.

Fred M. Miller, President, Resort Aviation is also President of General Aviation Company, Inc. , Fullerton, California, a full service FBO with Unicorn.

INTERROGATORY NO. 8: For each such entity listed above, please state the name, address. and telephone number for said entity.

ANSWER TO INTERROGATORY NO. 8. Answer provided in question #1.

INTERROGATORY NO. 9: Please describe, with particularity, the existing facilities of Resort Aviation Services, Inc. at the Coeur d'Alene Airport which are solely utilized for the operation of Unicorn. By this interrogatory, we seek the specific equipemtn used by Resort Aviation Services, Inc. in its operation of the Federal Unicorn license. For each piece of equipment, please state its name, manufacturer, serial number, purchase date, and any and all service dates.

ANSWER TO INTERROGATORY NO. 9.

Resort owns six (6) hangers plus leases one (1) hanger from the County. In addition:

- Two story office with large lobby, three bathrooms, and a full kitchen.
- Pilots lounge.
- Pilot briefing facilities providing a no-charge computer link with **FAA** Flight Service and National Weather, and a link for Corporate pilots to their home office.
- Four fuel trucks.
- Four fuel tanks
- Two aircraft tugs
- De-icing equipment.
- Lavatory Service cart/portable for Corporate aircraft.
- Conference Room available for pilots and guests.
- Instruction classroom.
- Asses to fax and copy equipment.
- Unicorn transmitter/Receiver, Icom, model IC4200.
- Power Supply, Icom PS-80
- Altimeter: part # 101720-01545, SN # 6118380
- Wind Director and Wind speed gauges:
- Antenna: Ground plane antenna for 118-136 NHZ aircraft band.
- Microphone: Icom, SM-6, SN #28622, purchased 8/2001

INTERROGATORY NO. 10: Please list all equipment utilized by Resort Aviation Services, Inc. in its administration of the Federal Unicorn license at the Coeur d'Alene Airport, including equipment that is not used solely for the administration of the Unicorn license. For such equipment that is not utilized solely for the administration of the Unicorn license, please state what percentage of time the equipment is used for the administration of the Unicorn license. For each piece of equipment, please state its name, manufacturer, serial number, purchase date, and any and all service dates.

ANSWER TO INTERROGATORY NO. 10. Answered in #9.

INTERROGATORY NO. 11: Please state the amount of fuel (in gallons) purchased by Resort Aviation Services, Inc. at its facilities on the Coeur d'Alene Airport in Kootenai County, Idaho, for the following years:

- (a) **1999;**
- (b) **2000;**
- (c) **2001;and**
- (d) **2002 to date**

ANSWER TO INTERROGATORY NO. 11.

1999 = 231,517gallons
2000 = 180,105gallons
2004 = 220,572gallons
2002 = 278,178gallons (YTD)

INTERROGATORY NO. 12: Please state the amount of revenue generated in gross dollar sales by Resort Aviation Services, Inc. for its sale of aviation fuels at the Coeur d'Alene Airport in Kootenai County, Idaho, for the following years:

- [a) 1999;
- (b) 2000,
- (c) 2001,and
- (d) 2002 to date

ANSWER TO INTERROGATORY NO. 12. Irrelevant to the issue of who can give the best service and it is proprietary information.

INTERROGATORY NO. 13: For the amount in your previous answer, please state what percentage of the gross sales were purchased by pilots who were not from Kootenai County, Idaho.

ANSWER TO INTERROGATORY NO. 13. We do not breakdown sales to pilots by geographic locations, all customers are listed by name and all are equally important to us.

INTERROGATORY NO. 14: Please list all vendors who add fuel to Resort Aviation Services, Inc. for:

- (a) 1999,
- (b) 2000.
- (c) 2001,
- (d) 2002

ANSWER TO INTERROGATORY NO. 14.

1999- Western Petroleum
2000- Western Petroleum
2001- City Service
2002- City Service and Western Petroleum.

INTERROGATORY NO. 15: Please identify by name and home address every person employed by Resort Aviation Services, Inc. in Kootenai County, Idaho, at the Coeur d'Alene Airport, whose duties in any way involve the administration of the FCC Unicorn license, and provide the job description and duties for each.

ANSWERS TO INTERROGATORY NO. 15. The employees are listed in answer #41. We are refusing to provide employees home addresses on the basis of individual privacy and such information is irrelevant to the issue, and can be contacted through Resort.

INTERROGATORY NO 16: Please state any and all actions on the part of the Coeur d'Alene Airport, its officers, its agents, which you feel were done in violation of the FCC Unicorn license. By this interrogatory, we seek:

- (a) The date of the alleged occurrence;
- (b) The act which you allege was a violation of the any FCC regulation;
- (c) The name and/or title of the employee;
- (d) Any actions which you took to remedy the situation;
- (e) Any and all writings evidencing said alleged violation; and
- (f) What remedial action if any was taken by the airport?

ANSWER TO INTERROGATORY NO. 16.

- a. Date of occurrence
May 6, 2002
May 7, 2002
November 16, 1999
November 30, 1998
- b. Failure to notify the Unicorn operator, Resort Aviation of Airport employees and equipment operating on the active runways.
- c. Name of Airport employee operating the equipment on the active Runways without notifying Resort Aviation, the Unicorn operator, is unknown. The Airport Manager should know his people and staffing times, and be able to provide this data.
- d. Wrote letters to Airport Manager:
11/30/98
11/10/1999 – Scott Reed's letter to Tom Taggart, County Admin
5/01/02
5/07/02
6/04/02
- e. See attached letters from Resort employees.
- f. None to our knowledge – Greg Delavan never responded to any of my letters.

- g. No, since we are not aware that Delavan took corrective action, and the refusal to notify the Unicorn operator continually into 2002, defined above.

INTERROGATORY NO. 17: Please state any and all reasons why you would be adverse to Kootenai County holding the present FCC Unicorn and allowing Resort Aviation Services, Inc. to be a sub-licensee of Kootenai County.

ANSWERS TO INTERROGATORY NO. 17.

- a. The Airport Manager has demonstrated by his own performance and that of his staff:
- Callous disregard for aircraft safety.
 - Failure to communicate with Resort, a tenant and Unicorn operator.
 - Favoritism towards a competitor.
 - A long standing and on going campaign designed to hurt Resort aviation, and possibly cause them to go out of business.

The Airport Manager, does not follow proper Airport safety procedures involving the usage of the Unicorn and Airport safety. The Airport Manager/staff is required to notify the Unicorn operator that men and equipment are operating on a runway, and that, that runway is closed to traffic. Thereby the Unicorn operator announce to incoming traffic.

There have been several times as late as 2002 wherein the Airport office failed to notify Resort.

The procedure for notification is defined under:

1. Coeur d' Alene Airport Rules and Regulations and Minimum standards for Commercial Aeronautical activities, approved by the FAA and signed by the Airport Manager.
2. Airport Certification Specifications – Part 139, required by the FAA, signed by the Airport Manager.

I wrote to the Manager on four occasions, and requested his response for on corrective action; no response was received from him.
(see attached letter from Fred Miller to Greg Delavan dated 5/7/02, 6/4/02 and November 1998).

Prior to 2002, I wrote a letter to Tom Taggart, County Administrator, Delavan's superior, letter dated 9/25/99. also our Attorney wrote a

letter dated 11/10/99. (see attachment)

Mary Hopkins. airport office, informed Kathy Garren, they were not required to notify us by fax on runway closure.

Mary Hopkin's memo to Greg Delavan (attached), dated November 16, 1999 (furnished to Resort as part of their answers to our interrogatories). An analysis of of her memo reveals the following:

1. Date of alleged incident: August 26, 1999
2. Date of her memo: November 16, 1999
3. Note: Resort never received a copy of this complaint from the airport office until receiving their interrogatory answer.
4. If the incident was real and not fictitious, why would a memo be written some three (3) months later internally and not brought to the attention of Resort.
5. The answer to item 4, above is Scott Reed's letter dated 11/10/99 to the Mr. Tom Taggart, County Administrator, (Delavans superior). It is obvious that **Ms.** Hopkins memo was in response to Mr. Reeds letter to Mr. Taggart.
6. Ms. Hopkin's charges that the Unicorn operator announced runway 19 was closed, but 01 was open is false.
Our employee operating the Unicorn that day was Kathy Garren, the Office Manager. **Ms.** Garren categorically denies this charge as would any other reasonable, objective person. No one in their right mind would close one end of a runway, and announce the other end open. The memo is false and self serving.

Therefore any objective Management can draw the following conclusions on the County Airport Manager:

1. Either lacks the management skills or the desire to effectively direct his employees.
 2. Callous disregard for air safety.
 3. Refusal to cooperate with Resort Aviation, the Unicorn operator
To allow safe notification to the pilots.
 4. If the County Airport Manager held the license, does that mean he would suddenly turn a new leaf, and follow correct procedures? One must be judged on demonstrated performance.
- b. He does not communicate with Resort. His response to his

interrogatory answer that he does communicate with Resort Aviation from "time to time". That's a lie, and supports our opinion regarding his integrity.

- c. Favoritism towards Southfield and causes financial harm to Resort. (attached: my letter to Tom Taggart, dated 9/25/99). Scott Reed has a file on these occurrences, but those that stand out:
- Airport staff. particularly, Phil Cummings has escorted aircraft (after landing) directly to Southfield on several occasions.
Note: Phil has never done this same courtesy for Resort, ever. This action is clearly favoritism and improper use of Airport (County employee) staff, unethical, and possibly illegal.
 - 1999: Phil Cumming's memo to Greg Delavan, dated 11/17/99 (Airport's answer to our interrogatory and marked exhibit F) in which he admits talking to the organizer of the Bonanza fly-in, and telling them that Southfield had better fuel prices and could provide transportation.
Note: This organization had previously contacted Resort, received a discount on fuel price, which they accepted, plus had orders for rent-a-cars on the arrival sheets and tie-down for the group.

When the planes entered the traffic pattern, Mr. Cummings broke into

The Unicorn frequency and directed the to a location on the south end of the field, by Southfield. Ms. Garren heard Mr. Cummings redirecting aircraft away from Resort.

Ms. Garren called the Airport office, and Mary Hopkins stated that our Line Manager was informed that Monday they were going to park this group on the South end of the field. We were not aware of this change.

Is this the proper, ethical, and legal role of a County employee?

Note: The fly- in was August, 1998 and Mr. Cummings memo to Mr Delavan is dated 11/17/99, 1 year, 2 months later.

Note: The date of this memo (11/17/99) and Mr. Reed's letter to Mr. Taggart, dated 11/10/99, seven (7) days later.

- 1998: Casino Air had scheduled, and placed an order with Resort for fuel, ground handling, lavatory service and rent-a-car for their B-737. After notification to the Airport office and, a few days before the arrival date , Chyrel Moon, Manager of Service/Casino called Ms. Garren and asked who a Phil Cummings is and why is he trying to get their business redirected to this Southfield fuel: He told her he

had to check on Resorts de-icing fluid and make sure it was DEQ approved. And that he would get back to her. Ms. Moon stated that they could not land at Coeur d' Alene if we did not have de-icing capabilities, Company regulations. Ms. Garren faxed her the proper documents to verify that we were approved and could comply. Ms. Garren reported the call to this writer, and I called Ms. Moon back to determine what was happening, she reported to me that a Phil Cummings from the Coeur d' Alene Airport had called her to state:

- A. Southfield had a lower fuel price
- B. Resorts may or may not have legal under EPA standards, proper de-icing fluid, that he would check for her.
- C. Our people were not properly trained per Part 139 standards.

Note: Just 2 or 3 months prior, we received a complete inspection by the State Division of Environmental Quality for hazardous material storage and usage. That inspection included our 55 gallon drums of de-icing fluid in the original manufacturers container with stickers on each drum giving the material content and certifying that it met EPA standards. The Department of Health gave us a Certificate of full compliance and delivered one to the Airport office and to Phil Cummings. He had that certificate in his file at the time of his call to Casino.

- Prior to Casino's arrival, the FAA made an inspection of the Airport and each FBO for compliance with their Part 139 standards. Two weeks prior to the FAA inspection, Mr. Cummings requested copies of any and all training tests of completion for each Line/Fueler personnel. They were hand delivered to him. When Mr. Harold Hanke of the FAA visited the Airport, Mr. Cummings, who had in his possession, copies of our tests, failed to give those to Mr. Hanke. Subsequently, we received a "stop-fueling " order from the Airport Manager. We contacted Mr. Hanke, who was perplexed as to why Mr. Cummings did not produce those tests to him. We faxed each one to Mr. Hanke, who notified the airport office, that we were in compliance.

The airport manager still refused to release Resort to resume fueling. I contacted To Taggart, County Administrator, who went out to the Airport office, obtained all of the facts, and called me from that office, stating we were okay and in compliance.

- d. We lack confidence in him and his cohorts at the airport office to manage the issues and administration of said Unicorn license by his demonstrated performance. If he was removed from that position, along with his fellow cohorts, and replaced with a fair, objective, and professional Manager, then we might have a different view.

- e. We see his attempt at acquiring the license as a typical subterfuge to give it to his favorite FBO. Southfield.
- e. Lack of ethics:
The Airport Manager sold mobile radios to the County. A sale made by him or a Corporation controlled by he. The sale was made by a County employee to the County. There were no competitive bids. Resort, which offers pilot supplies was not informed of this County purchase nor allowed to submit a bid.
- f. Lack of integrity: For the reasons cited above we believe he is taking advantage of his position, please see attached letter from Denise Johnson, former County employee.
- g. Airport Manager, Greg Delavan has made damaging and derogatory statements against Resort Aviation and its employees.

Example:

Rod Propst, Fullerton, California Airport Manager, President of Southwest Airport Manager's Association, was making a presentation at a conference for that association held in Monterey California.

Mr. Propst, who can be disposed, reported to this writer:

1. "I was approached by Greg Delavan, who identified himself as the Airport Manager, from Coeur d' Alene, Idaho."
2. "I thought it strange that this Manager from the Northwest would attend a conference in Monterey. for the Southwest association."
3. Delavan proceeded to make derogatory remarks about Fred Miller and Resort Aviation. He thought Delavan's actions wrong and inappropriate.
4. I think Delavan's actions was inappropriate, in-keeping with his past and current performance, and damaging to the reputation of both Resort and this writer. We are reviewing with Mr. Reed our appropriate redress to these damages.

INTERROGATORY NO. 18: Please list any and all concerns you would have with Kootenai County being the holder of the FCC Unicorn license at the Coeur d'Alene Airport.

ANSWER TO INTERROGATORY NO. 18. Responses given in question #17.

INTERROGATORY NO. 19: Please state the hours of operation for the Unicorn license operated by Resort Aviation Services, Inc

ANSWER TO INTERROGATORY NO. 19. Answer on answer #4

INTERROGATORY NO. 20: Please state the radio frequency for the Unicorn license at the Coeur d'Alene Airport presently held by Resort Aviation Services. Inc.
Aviation Services, Inc

ANSWER TO INTERROGATORY NO. 20:

The frequency used by Empire, and approved by the FCC, and which is published in the FAA Airport Facilities Directory, NOS Sectionals, Jeppessen, IFR approach charts, and Airport Facilities guide. The frequency we are using, 122.8 was inherited from Empire Airlines, a copy of transfer of name-change was given to the Airport office. Who provided no objection, and the said frequency was approved by the FCC. We have continued to use this frequency. Greg Delavan in his application, also listed 122.8 as the Unicorn frequency. Recently, through interrogatories answers from the Airport, we found out there is an RCO on the field. The Airport did not advise Resort. The government airguide publications do not reflect an RCO. We would be happy to change the frequency if required by the FCC.
(see attached #20)

INTERROGATORY NO. 21: Please state the radio frequency for the common traffic advisory function (CTAF) at the Coeur d'Alene Airport in Kootenai County, Idaho.

ANSWER TO INTERROGATORY NO. 21: See answer to #21.

INTERROGATORY NO. 22: Please state in your own words what you perceive to be the duties of the Unicom license holder.

ANSWER TO NO. 22.

To provide advisory service upon request and without discrimination and impartial to all available ground service. To provide information to the safe operation of aircraft: condition of runways, types of fuel available, wind conditions, weather, dispatching, and other necessities. To communicate with utility vehicles concerning runway conditions and Safety hazards on the airport.

INTERROGATORY NO. 23: Please state what you perceive to be the duties of a Unicorn operator.

ANSWER TO INTERROGATORY NO. 23. To insure the employees authorized to operate the Unicorn are properly trained, and to monitor the activities.

INTERROGATORY NO. 24: Please state what you believe to be the purpose of the CTAF frequency.

ANSWER TO INTERROGATORY NO. 24. To provide airport advisory practices to aircraft operating to and from an airport, without an operating control tower.

INTERROGATORY NO. 25: Please state who is allowed to communicate on the Unicorn frequency.

ANSWER TO INTERROGATORY NO. 25. These questions tend to be confusing, and appear to have already been answered within this answer report.

INTERROGATORY NO. 26: Please state who is allowed to communicate the CTAF frequency.

ANSWER TO INTERROGATORY NO. 26. See answer to #25.

INTERROGATORY NO. 27: Please list the minimum educational requirements for employees of Resort Aviation Services, Inc. who operate the Federal Unicorn license.

ANSWER TO INTERROGATORY NO. 27:

They must be trained by an FAA certified flight instructor, who upon successful completion of said training, are issued a certificate. In addition the new employee is given two (2) weeks dual training by Ms. Garren before released to operate the Unicorn on a solo basis. If at any time during the training phase, the employee does not perform to our

satisfaction, they are released from employment.

INTERROGATORY NO. 28: Please provide a list of all complaints (both written and oral) received by Resort Aviation Services, Inc. relating to its administration of its Unicorn license. For each such complaint, please state:

- (a) The name of the complaining party;
- (b) The date of the alleged complaint;
- (c) The alleged action or inaction which gave rise to the complaint; and
- (d) The action, if any, taken by Resort Aviation Services, Inc. to rectify the situation. If any remedial action was taken, please state the date the action was taken and by whom including the name, address and telephone number of the party taking the remedial action.

ANSWER TO INTERROGATORY NO. 28. Refer to our answer to production of records, answer #7 and the Airport's answer to our interrogatory in which you reported none.

INTERROGATORY NO. 29. Has Resort Aviation Services, Inc., its officers, directors, shareholders, or supervisors directed Resort Aviation Services, Inc. employees to violate the Unicorn?

ANSWER TO INTERROGATORY NO. 29. No.

INTERROGATORY NO. 30. Have Resort Aviation Services, Inc. employees violated radio procedures of Unicorn?

ANSWER TO INTERROGATORY NO. 30. To the best of our knowledge, no.

Dated this 22nd day of November, 2002.

Scott W. Reed
Attorney for Resort Aviation Services, Inc.
P. O. Box A
Coeur d'Alene, Idaho 83816
(208) 664-2161
Fax: (208) 765-5117

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was mailed, first class mail, postage prepaid, this 22nd day of November, 2002 to:

JOHN CAFFERTY, ESQ.
KOOTENAI COUNTY DEPT. OF
LEGAL SERVICES
451 GOVERNMENT WAY
P. O. BOX 9000
COEUR D'ALENE, IDAHO 83816-9000

DANA LEAVITT
ATTORNEY AT LAW
INVESTIGATIONS AND HEARINGS DIVISION
FEDERAL COMMUNICATIONS COMMISSION
445 12TH STREET SW - ROOM 3-b443
WASHINGTON, D.C. 20554

STATE OF IDAHO)
 ss:
County of Kootenai)

Kathlean Garren, being first duly sworn on oath, deposes and says:

I am Operations Manager at Resort Aviation Services, Inc. I have personal knowledge of all operations. I have read the Answers to Interrogatories dated November 21, 2002. To the best of my knowledge, all matters stated therein are true and correct.


Kathlean Garren